

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - : 18 Cr. 340 (LGS)
SOHRAB SHARMA, :
a/k/a "Sam Sharma," and :
ROBERT FARKAS, :
a/k/a "RJ," :
Defendants. :
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying submission in support of its motions *in limine*, the United States of America, by its attorney, Craig Stewart, Attorney for the United States acting under 28 U.S.C. § 515, hereby moves *in limine* for rulings from this Court:

- i. allowing the Government to admit evidence at trial of specified criminal acts of defendants Sharma and Farkas as direct proof of the charged conspiracy to defraud Centra Tech investors, or for purposes authorized by Federal Rule of Evidence 404(b);
- ii. allowing the Government to admit evidence of various statements by the defendants or their co-conspirators during and in furtherance of that conspiracy pursuant to Federal Rule of Evidence 801(d)(2)(E);
- iii. allowing the Government to admit evidence of various statements by the defendants' agents or employees at Centra Tech pursuant to Federal Rule of Evidence 801(d)(2)(D);
- iv. precluding the defendants from offering evidence or arguments at trial about the defendants' alleged reliance on advice from a fake law firm called "Pope & Dunn";
- v. precluding the defendants from offering evidence or arguments about offers that they claim to have made to the United States Securities and Exchange Commission (the "SEC") and to the Government for the purported purpose of effectuating the return of funds that they stole from their victims;
- vi. precluding the defendants' proposed expert witnesses from testifying; and

- vii. allowing the Government to introduce statements that defendant Robert Farkas made during post-arrest proffer sessions with the Government and the Federal Bureau of Investigation (“FBI”), in the event that he opens the door at trial to those proffer statements.

Dated: New York, New York
 October 11, 2019

Respectfully submitted,

CRAIG STEWART
Attorney for the United States
Acting Under 28 U.S.C. § 515

By: _____ /s/
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